



ESTABLISHED 1850

JOHN HASSALL, INC. • WESTBURY • LONG ISLAND • N.Y. • 11590

Tel. 516 • 334 • 6200 • Telex No. 144585

*Regina*  
*Jim*

*cc for Arison  
Would these documents  
satisfy requirements  
per 1/30 letter?*

~~Star~~  
↓  
PAB

February 10, 1983

Conrad Simon  
Director, Air and Waste Management  
U.S. Environmental Protection Agency  
Region II  
26 Federal Plaza  
New York, N.Y. 10278

Mr. Conrad Simon;

*file*  
Please be advised, that the information requested by the Department of Environmental Conservation regarding contingency plan part 360.8 (C) (3) and closure plan with financial requirements part 360.8 (C) (6) have been forwarded as directed on January 10, 1983.

If you wish a copy of the Plans and relative information please please let me know.

Very truly yours,

*Karl W. Horlitz*  
Karl W. Horlitz, P.E.  
Plant Manager

*N.Y.*  
*EPA I.D.# 000 204 5417*

KWH:dh

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MAR 9 11 32 AM '83  
NEW YORK, N.Y. 10001

47-15-15 7/82)

RCRA INSPECTION FORM

Report Prepared for:

Generator ☒

Transporter ☐

HWM (TSD) facility ☒

Copy of report sent to the facility ☐

17

PERMITS ADMINISTRATION  
MAY 24 3 17 PM '83  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

Loc. Code  
28 2400

Facility Information

Name: JOHN HASSALL INC.

Address: CANTIAGUE ROCK ROAD  
WESTBURY, NEW YORK 11590

EPA ID#: NY<sup>D</sup>002045-417

Date of Inspection: APRIL - 20, 1983

Participating Personnel

State or EPA Personnel: AUGUST LARUFFA NYS DEC REG I

Facility Personnel: KARL HORLITZ - PLANT MGR.  
VICTOR PALESE - LAB. MGR.

Report Prepared by Name: AUGUST LARUFFA

Agency: NYS DEC REG I

Telephone #: (516) 751-7900

RECEIVED

APR 28 1983

BUREAU OF  
HAZARDOUS WASTE OPERATIONS  
DIVISION OF SOLID WASTE

Approved for the Director by: James L. Seal  
REGIONAL SOLID WASTE ENGINEER  
REGION I, NYS DEC



Summary of Findings

Facility Description and Operations

The facility produces various types of metal fasteners such as nails, screws and rivets.

The operation involves handling various metallic wire from which the fasteners are made, forming the required shape of the fastener plus various other secondary operations such as threading, fluting, slotting, drilling, tapping, turning, grinding and ~~trimming~~ ~~and plating~~ of the fasteners. Wastes from these operations consist of metal filings and chips which are collected by a metal scrap dealer.

Deburring, tumbling, cleaning and plating operations generate a wash water waste stream

Describe the activities that result in the generation of hazardous waste.

Degreasing of machines with chlorinated solvents. Oily  
waste water from parts quenching and cleaning. Sludge  
generation from the waste water treatment facility.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

Metal Hydroxide Sludge - D007 - 30 cu. yd in 9000 gal tank  
Contaminated diatomaceous earth - ~~D007~~ non hazardous  
Chlorinated Solvents - U266 -  $\approx 8$  drums (55 gal)



Is there reason to believe that the facility has hazardous waste on-site?

- a. If yes, what leads you to believe it is hazardous waste?  
Check appropriate boxes:

- ☒ Company admits that its waste is hazardous during the inspection.
- ☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☒ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- ☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- ☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

HAZARDOUS WASTE MANAGEMENT FACILITY CHECK LIST  
(Facilities Subject to 40 CFR 265 Standards)

YES   NO   N/A

40 CFR Part 265 Subpart B General Facility Standards

265.13-General Waste Analysis

- 1) Is there a detailed chemical and physical analysis of a representative sample of the waste or each waste?  
(At a minimum this analysis must contain all the information necessary for proper management of the waste)

- 2) Does the character of the waste handled at the facility change from day to day, week to week, etc., thus requiring frequent testing?

You may check only one

Waste characteristics vary \_\_\_\_\_

All waste are basically the same \_\_\_\_\_

Company treats all waste as hazardous \_\_\_\_\_

- 3) Is there a written waste analysis plan at the facility?

Does it contain the following:

- a) Parameters for each waste to be analyzed and the rationale for the selection of these parameters.
- b) Test methods used to test these parameters.
- c) Sampling methods to obtain a representative sample of the waste to be analyzed.
- d) Frequency of repeated analysis to ensure accurate and current information.
- 4) Does hazardous waste come to this facility from an outside source? e.g. another generator.
- 5) If waste comes from an outside source, are there procedures in the plan to insure that waste received conforms to the accompanying manifest?

265.14-Security

- 1) Is there: a) a 24-hour surveillance system? or,  
b) a suitable barrier which completely surrounds the active portion of this facility?
- 2) Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?

If no, explain what measures are taken for security.

265.15 - General Inspections Requirements

- 1) Does the facility have a written inspection schedule?
- 2) Does the schedule identify the types of problems to be looked for and the frequency of inspections?
- 3) Does the owner/operator record inspections in a log?
- 4) Is there evidence that problems reported in the inspection log have been remedied?

If no, please explain.



265.16 - Personnel Training

- 1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

YES NO N/A

✓ ~~NO~~ —

If yes, have facility personnel taken part in an annual review of training?

✓ — —

- 2) Is there written documentation of the following:

—job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

✓ — —

—type and amount of training to be given to personnel in jobs related to hazardous waste management?

✓ — —

—actual training or experience received by personnel?

✓ — —

- 3) Are training records kept on all employees for at least 3 years?

✓ — —

265.17 - General Requirements for Ignitable, Reactive or Incompatible Wastes

- 1) Are there ignitable, reactive or incompatible wastes on site?

✓ — ~~NO~~

If yes, what are the approximate types and quantities and location of the waste.

STODDARD SOLVENT

- 2) Have precautions been taken to prevent accidental ignition or reaction of ignitable or reactive waste?

✓ — —

If no, please explain.

- 3) In your opinion, are proper precautions taken so that these wastes do not:

— generate extreme heat or pressure, fire or explosion, or violent reaction?

✓ — —

— produce uncontrolled toxic mist, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions?

✓ — —

— damage the structural integrity of the device or facility containing the waste?

✓ — —

— threaten human health or the environment?

✓ — —

40 CFR 265 - Subpart C - Preparedness and Prevention

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

- an internal communications or alarm system?
- a telephone or other device to summon emergency assistance from local authorities?
- portable fire equipment?
- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

265.33 Is equipment tested and maintained?

265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

265.35 Adequate aisle space?

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed: Explain.

YES	NO	N/A
✓	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

- 1) Does the plan describe arrangements made with the local authorities?
- 2) Has the contingency plan been submitted to the local authorities?
- 3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?
- 4) Does the plan have a list of what emergency equipment is available?
- 5) Is there a provision for evacuating facility personnel?
- 6) Was there an emergency coordinator present or on call at the time of the inspection?

✓	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—
✓	—	—

40 CFR 265 Subpart E-Manifest System, Recordkeeping and Reporting

265.71 - Use of the Manifest

1) Has the facility received hazardous waste from an off-site source since November 19, 1980?

If no, skip to 265.73 - Operating Record

2) If yes, does it appear that the facility has a copy of a manifest for each hazardous waste load received?

If not, please explain.

—	✓	—
—	—	—



- 3) How many post-November 19 manifests does the facility have?  
(Estimate if the number is large)
- 4) Does each manifest have the following information?  
(circle missing information)
- a manifest document number? — — —
  - the generators name, mailing address, telephone number and EPA I.D. #? — — —
  - the transporters name and EPA I.D. Number? — — —
  - the TSD name, address, telephone number & EPA I.D. Number? — — —
  - a description of the waste (DOT)? — — —
  - the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded; into or onto the transport vehicle? — — —
  - a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA? — — —
- (Obtain a copy of the incomplete manifests)

#### 265.72 - Manifest Discrepancies

Have there been significant discrepancies between the quantity and type of waste received and the waste identified on the manifest?

Describe unreconciled discrepancies.

#### 265.73 - Operating Record

- 1) Does the facility keep an operating record? ✓ — —
- 2) Does the record contain the following information:
  - a) Description and quantity of waste on-site and the method(s) and date(s) of its Treatments, Storage & Disposal? ✓ — —
  - b) The location and quantity of each hazardous waste at each location? ✓ — —
  - c) Records and results of waste analysis and trial tests performed and identified in the waste analysis plan? ✓ — —
  - d) Summary reports and details of all incidents that require implementing the contingency plan. — — —
  - e) Records and results of inspections for the past 3 years or November 19, 1980 whichever is less? ✓ — —
  - f) Monitoring, testing or analytical data where required for:
    - Groundwater, Land Treatment, Incinerators, and Thermal Treatment? — — ✓

#### 265.76 - Unmanifested Waste Report

Has the facility accepted hazardous waste from off-site sources without a manifest?

If yes, has the facility submitted an unmanifested waste report?

40 CFR 265 Subpart F - Groundwater Monitoring

N/A YES NO N/A

(Applies only to surface impoundments, landfills and/or land treatment facilities.)

Is a groundwater monitoring plan available at the facility? \_\_\_\_\_

If yes, please fill out the appropriate Groundwater Monitoring Questionnaire and attach to this report.

40 CFR 265 Subpart G - Closure and Post-Closure

265.111 Closure Performance Standard

Have any portions of the facility been closed since November 19, 1980? \_\_\_\_\_ ✓

If yes, please explain \_\_\_\_\_

265.112 - Closure Plan

Does the facility have a written closure plan? \_\_\_\_\_ ✓  
(Applies to all types of TSD facilities)

If yes, does the written plan include:

1. A description of how and when the facility will be partially (if applicable) and ultimately closed? \_\_\_\_\_ ✓
2. An estimate of the maximum inventory of wastes in storage or treatment at any time during the life of the facility? \_\_\_\_\_ ✓
3. A description of the steps necessary to decontaminate facility equipment during closure? \_\_\_\_\_ ✓
4. A schedule for final closure including the anticipated date when waste will no longer be received and when final closure will be completed? \_\_\_\_\_ ✓
5. Does the owner/operator have a written estimate of the cost of closing the facility? \_\_\_\_\_ ✓

If yes, what is it? (\$) 25,000

265.118 - Post Closure Plan

Does the facility have a written post-closure plan? \_\_\_\_\_ ✓  
(Applies only to disposal facilities)

If yes, Does the Plan:

1. Identify the activities which will be carried on after closure and the frequency of these activities? \_\_\_\_\_
2. Include a description of planned groundwater monitoring activities and their frequency during post-closure? \_\_\_\_\_
3. Include a description of planned maintenance activities and frequency to insure integrity of final cover during post-closure? \_\_\_\_\_
4. Include the name, address and phone number of a person or office to contact during post-closure? \_\_\_\_\_
5. Does the owner/operator have a written estimate of the cost of post-closure for the facility? \_\_\_\_\_

If yes, what is it? (\$)



Please circle all appropriate activities and answer questions on indicated pages for all activities circled.

<u>Storage</u>	<u>Treatment</u>	<u>Disposal</u>
<u>Container - pg 6</u>	<u>Tank - pg 7</u>	<u>Landfill - pg 11</u>
Tank, above ground-pg 7	Surface Impoundment-pg 8	Land Treatment - pg 10
Tank, below ground-pg 7	Incineration - pg 12	Surface Impoundments - pg 8
Surface Impoundments-pg 8	Thermal Treatment-pg 12	Other _____
Waste Piles - pg 9	Land Treatment - pg 10	
Other _____	Chemical, Physical and Biological Treatment - pg 13	
	Other _____	

YES NO N/A

40 CFR 265 - Subpart I - Containers

- 1) - What type of containers are used for storage.  
Describe the size, type, quantity and nature of waste  
(e.g. 12 fifty-five gallon drums of waste acetone)  
*55 gal drums*
- 2) - Is there a containment system for spills, leaks and precipitation?  
*indoor storage on pallets*  
If yes, describe. *over a concrete floor.* ☒ ☐ ☐
- 265.171 - Do the containers appear to be in good condition, not in danger of leaking?  
*Yes* ☒ ☐ ☐  
If not, please describe the type, condition and number of leaking or corroded containers. Be detailed and specific.
- 265.172 - Are hazardous waste stored in containers made of compatible materials?  
*Yes* ☒ ☐ ☐  
If not, please explain.
- 265.173(a) - Are all containers closed except those in use? ☒ ☐ ☐
- 265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking? ☒ ☐ ☐
- 265.174 - Is the storage area inspected at least weekly? ☒ ☐ ☐
- 265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line? ☒ ☐ ☐
- 265.177 - Are incompatible wastes stored separate from each other?  
*Yes* ☒ ☐ ☐  
If no, explain

40 CFR 265 Subpart J - Tanks

YES NO N/A

3-10000 gal indoor treatment tanks

265.190 1) What are the approximate number and size of tanks containing hazardous waste? 9-9000 gal - 8 used in treatment 1 for sludge

2) Identify the waste treated/stored in each tank. industrial waste water containing Cu, Fe, Ni some oil & glass

265.192 - General Operating Requirements

1) Are the tanks maintained so that there is no evidence of past, present, or risk of future leaks?

If no, please explain.

2) Are there leaking tanks?

3) Are all hazardous wastes or treatment reagents being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?

4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank

265.194 - Inspections

1) Is the tank(s) inspected each operating day for  
a) discharge control equipment  
b) monitoring equipment  
c) level of waste in tank

2) Are the tanks and surrounding areas (e.g., dike) inspected weekly for leaks, corrosion or other failures?

3) Are there underground tanks?

If yes, how many and can they be entered for inspection?

265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

If no, please explain.

265.199 - Does it appear that incompatible wastes are being stored separate from each other?



40 CFR 265 Subpart K - Surface Impoundments

N/A

YES NO N/A

Describe the design and operating features of the surface impoundment to prevent ground water contamination (e.g., liner leachate collection system).

- 265.220 - Give the approximate size of surface impoundments (gallons or cubic feet). Please specify the types of wastes stored and treated.
- 265.222 - Is there at least 2 feet of freeboard in the impoundment?
- 265.223 - Do all earthen dikes have a protective cover to preserve their structural integrity?
- If yes, please specify the type of covering.
- 265.226 - 1) Is the free board level inspected daily?
- 2) Are the dikes surrounding the surface impoundment inspected for leaks, deterioration or failures inspected weekly?
- 265.229 - 1) Are any ignitable or reactive wastes placed in the impoundment?
- 2) If yes, is the waste treated immediately after placement in the impoundment to render the waste non-active and/or non-ignitable?
- 3) If no, to (2) explain.
- 265.230 - Are incompatible wastes placed in the impoundment?
- If yes, explain.

40 CFR 265 Subpart L - Waste Piles

N/A

YES NO N/A

265.250 - How many waste piles are on-site and approximately how large are they? (Please indicate size and height and types of wastes in piles.)

265.251 - Is the waste pile protected from wind erosion?

a) Does it appear to need such protection?

b) Explain what type of protection does exist.

265.253 Containment.

1) Is leachate run-off from the waste piles a hazardous waste? If no, skip down to 265.256.

2) Is the pile placed on an impermeable base?

3) Is run-on diverted away from the pile?

4) Is the leachate and run-off collected and treated?

If no to any of the above questions above then:

5) Is the pile protected from precipitation and run-on?

6) Are wastes containing free liquids placed in the pile?

265.256 - 1) Are ignitable or reactive wastes placed on the pile?  
If no, skip to §265.257

2) Is the ignitable or reactive waste added to existing pile resulting in it no longer meeting the definition of ignitable and reactive?  
If no, explain.

3) Is the waste protected from any materials or condition that may cause it to ignite or react?  
If no, explain.

265.257 - Does it appear that a pile of incompatible wastes is being stored separate from other wastes or materials, or protected from them by means of a dike, berm, wall or other device? If no, explain.

40 CFR 265 Subpart M - Land Treatment

N/A

265.270 - Identify the types of waste and the size of the land treatment area?

265.272 - General Operating Requirements

YES NO N/A

- 1) Can the facility operator demonstrate that the hazardous waste has been made less or non-hazardous by biological degradation or chemical reactions occurring in or on the soil?

— — —

Please explain how.

- 2) Is run-on diverted from the active portions of the land treatment facility?

— — —

- 3) Is run-off from the active portions of the facility collected?

— — —

If yes, is the run-off a hazardous waste?

— — —

265.276 - Food Chain Crops

- 1) Are food chain crops being grown on the facility property?

If yes, can the facility operator document that arsenic lead and mercury:

— — —

- will not be transferred to the crop or ingested by food-chain animals or

— — —

- will not occur in greater concentrations in the crops grown on the land treatment facility than in the same crops grown on the untreated soils.

— — —

- 2) Has notification of the growing of food chain crops been made to the Regional Administrator?

— — —

265.278 - Is there a written and implemented plan for unsaturated zone monitoring?

— — —

Make copy for office review.

265.279 - Are there records of the application dates, application rates, quantities and location of each hazardous waste placed at the facility?

— — —

265.281 - Is ignitable or reactive waste immediately incorporated into the soil so that the resulting waste no longer meets that definition?

— — —

If not, please explain.

265.282 - Are incompatible waste placed in separate land treatment areas?

— — —

If no, please explain.



265.300 - Identify the types of waste and size of the landfill.

265.302 - General Operating Requirements

- 1) Is run-on diverted away from the active portions of the landfill? \_\_\_\_\_
  - 2) Is run-off from active portions of the landfill collected? \_\_\_\_\_
  - 3) Is waste which is subject to wind dispersal controlled? \_\_\_\_\_
- Please explain how.

265.309 - Does the owner/operator maintain a map with:

- 1) The exact location and dimensions of each cell? \_\_\_\_\_
- 2) The contents of each cell and approximate location of each hazardous waste type? \_\_\_\_\_

265.312 - Is ignitable or reactive waste treated so that it is not ignitable or reactive before being placed in the landfill?

Explain how you know.

265.313 - Are precautions taken to ensure that incompatible waste are not placed in the same landfill cell?

If no, please explain.

265.314 Special Requirements for Liquid Waste

- 1) Are bulk or non-containerized wastes containing free liquids placed in the landfill? \_\_\_\_\_

If yes,

- a) Does the landfill have a liner which is chemically and physically resistant to the added liquid? or \_\_\_\_\_
- b) Is the waste treated and stabilized so that free liquids are no longer present? \_\_\_\_\_

- 2) Are containers holding liquid waste or waste containing free liquids placed in the landfill? \_\_\_\_\_

Please describe the types and contents of such containers placed in the landfill.

265.315 - Are empty containers placed in the landfill crushed flat, shredded or similarly reduced in volume before they are buried? \_\_\_\_\_

265.316 - Are small containers of hazardous waste in overpacked drums placed in the landfill? \_\_\_\_\_

If yes, please describe precautions taken to prevent the release of the waste.

- 1) What type of incinerator or thermal treatment is at the site  
( e.g water-wall incinerator, boiler, fluidized bed, etc.)
  - 2) List the types and quantities of HW incinerated or thermally treated.
  - 3) Is the residue from the incinerator thermal treatment unit a hazardous waste? \_ \_ \_
  - 4) What types of air pollution control devices (if any) are installed in the incinerator/or thermal treatment unit?
  - 5) Is energy recovered from the process?  
If yes, describe. \_ \_ \_
  - 6) What is the destruction and removal efficiency for the organic hazardous waste constituents?
- 265.341 - Does the operating record include additional analysis  
and to determine types of pollutants which might be emitted including:  
265.375
- heating value of the waste? \_ \_ \_
  - halogen and sulfur content? \_ \_ \_
  - concentrations of lead and mercury? \_ \_ \_
- If no to any of the above questions is there justification and documentation? \_ \_ \_
- 265.345 If operating, does it appear the incinerator/or thermal  
and treatment unit is operating at steady state for con-  
265.373 ditions of operation, including temperature and air flow? \_ \_ \_
- 265.347 - Monitoring and Inspection  
and  
265.377
- 1) Are existing instruments relating to combustion and emission controls monitored every 15 minutes?  
If no, explain \_ \_ \_
  - 2) Does the incinerator/thermal treatment have all the following instruments for measuring: wastefeed, auxiliary fuel feed air flow, incinerator temperature scrubber flow, and scrubber pH? (Circle missing instruments) \_ \_ \_  
If no, explain.
  - 3) Is the stack plume observed visually at least hourly for opacity and color? \_ \_ \_
  - 4) Are there any signs of leaks, spill and fugitive emissions associated with the pumps, valves, conveyors, pipes etc? If yes, describe. \_ \_ \_
  - 5) Are all emergency shutdown controls and system alarms checked to assure proper operation? \_ \_ \_
  - 6) Is there any reason to believe the incinerator is being operated improperly? i.e., steady state conditions are not maintained.  
If yes, explain. \_ \_ \_
  - 7) Is the incinerator/thermal treatment inspected daily?

	<u>YES</u>	<u>NO</u>	<u>N/A</u>
265.382 Is there open burning of hazardous waste?	—	—	—
a) If yes, what is being burned? (Only burning or detonation of explosives is permitted)			
b) If open burning or detonation of explosives is taking place approximately what is the distance from the open burning or detonation to the property of others?			

40 CFR 265 Subpart Q - Chemical, Physical and Biological Treatment  
(other than in tanks, surface impoundments or land treatment facilities)

N/A

1) Describe the treatment system at this facility and the types of wastes treated.

265.401 - Does the treatment process system show any signs of ruptures, leaks or corrosion?

— — —

If yes, describe.

265.401 - Is there a means to stop the inflow of continuously-fed hazardous wastes?

— — —

265.403 - Inspections

1) Is the discharge control safety equipment (e.g. waste feed cut-off systems, by-pass systems, drainage systems and pressure relief systems) in good working order?

— — —

Are they inspected at least once each operation day?

— — —

2) Does the data gathered from the monitoring equipment (e.g., pressure and temperature gauges) show treatment process is operating according to design?

— — —

Is data gathered at least once each operating day?

— — —

3) Are construction materials of the treatment process inspected at least weekly to detect corrosion or leaking of fixtures and seams?

— — —

4) Are the discharge confinement structures, (e.g. dikes) immediately surrounding the treatment unit inspected at least weekly to detect erosion or obvious signs of leakage (e.g. wet spots or dead vegetation)?

— — —

265.405 - Are ignitable or reactive waste fed into the waste treatment system treated or protected from any material or conditions which may cause it to ignite or react?

— — —

If yes, explain how.

265.406 - Are the incompatible wastes placed in the same treatment process?

— — —

If yes, please explain.



GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

262.11 - Hazardous waste determination

- 1) Did the generator test its waste to determine whether it is hazardous?

Is the waste hazardous?

- 2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

*Both*

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain.

*250*

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

- a manifest document number?
- the generators name, mailing address, telephone number and EPA I.D. Number?
- the transporters name and EPA I.D. Number?
- the name, address and EPA ID Number of the designated facility?
- a description of the wastes (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, package, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

(obtain a copy of the incomplete manifests)

40 CFR 262 - Subpart D - Recordkeeping and Reporting

262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)

262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 35 days ago?

If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?

YES NO N/A

*✓* *✓* *✓*

*✓* *✓* *✓*

*✓* *✓* *✓*  
*✓* *✓* *✓*  
*✓* *✓* *✓*  
*✓* *✓* *✓*

*✓* *✓* *✓*

YES NO N/A

40 CFR 262 - Subpart C - Pretransportation Requirements

262.30-33 Before transporting or offering hazardous waste for transportation off-site does the generator:

- 1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) ✓
- 2) Label each package according to DOT (i.e., 49 CFR 172) ✓
- 3) Mark each package according to DOT (i.e., 49 CFR 172) ✓
- 4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA." and include the generator's name, address and manifest document number. (i.e., 49 CFR 172.304) ✓

262.34 Accumulation Time

1) How is waste accumulated on-site?

☒ Containers

☒ Tanks

☐ Surface impoundments (complete BWM checklist)

☐ Piles (complete BWM checklist)

2) Is waste accumulated for more than 90 days?

If yes, complete BWM checklist

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT labeling requirements?

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT

SEP 13 1983

PERMIT BRANCH  
REGION II

SEP 13 3 46 PM '83

ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Karl Horlitz  
Plant Manager  
John Hassall, Inc.  
Cantiague Rock Road  
Westbury, NY 11590

Re: EPA Identification Number: NYD002045417  
Facility Location: Same  
Inspection Date: April 20, 1983

Dear Mr. Horlitz:

SWO 60 10102

GH  
WMA  
7/21/83

The Environmental Protection Agency (EPA) is charged with the responsibility for implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. §6901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 94-580 (1976).] By notification, you informed EPA that you conduct activities at the above referenced facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. §6904(5), and in 40 CFR §261. As required in Section 3005 of the Act, 42 U.S.C. §6925, and in 40 CFR §270, you requested a permit to conduct such hazardous waste activities.

John

In accordance with EPA's responsibility, an inspection was performed at this facility by a duly authorized representative of EPA pursuant to Section 3007 of the Act. This above referenced inspection revealed that your facility was acting as a generator by producing hazardous waste and was being used for treatment, storage and/or disposal of hazardous waste.

40 CFR Part 262 establishes standards for generators and 40 CFR Part 265 sets interim status standards for treatment, storage and disposal facilities that handle hazardous wastes. These interim status standards apply until final administrative disposition of the permit application submitted by the owner and operator of the facility has been made. No such final disposition has been made with respect to your facility, and thus the standards of Part 265 apply to that facility.

The inspection revealed that your facility was in violation of certain provisions of Part 262 and Part 265. On the basis of these findings, the Solid Waste Branch Chief, Region II, has determined that your facility is operating



in violation of Section 3002 and Section 3005 of the Act, 42 U.S.C. §6922 and §6925 and the regulations promulgated thereunder. The following paragraphs indicate the regulatory provisions that have been violated:

¶ 40 CFR §265.13(b) requires that the owner or operator of a hazardous waste treatment, storage or disposal facility must develop and follow a written waste analysis plan. At the time of the inspection, information present at your facility was insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.13(b).

¶ 40 CFR §265.15 requires that the owner or operator of a hazardous waste facility must develop and follow a written schedule of inspections for certain specified portions of its facility. The owner or operator must also retain a record of these inspections in a log or summary. At the time of the inspection, documents available at your facility were insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.15.

¶ 40 CFR §265.51 requires that the owner and operator of a hazardous waste facility must have a written contingency plan for the facility designed to minimize hazards to human health or the environment from any unplanned release of hazardous waste constituents. 40 CFR §265.52 describes the required contents of the contingency plan. At the time of the inspection, the content of this plan was insufficient to meet the requirements of this section. You were therefore in violation of 40 CFR §265.51.

Section 3008 of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or relevant regulations. The determination of whether a penalty is to be imposed is based upon the nature and seriousness of the violation and the good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above if the facility corrects all violations cited herein as expeditiously as possible and in no case later than sixty (60) days from the receipt of this letter. Should the cited violations be discovered at this facility during future inspections, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of any other inspection.

Please confirm in writing within sixty (60) days of your receipt of this letter that the above referenced violations have been corrected and include supporting documentation as appropriate. This confirmation should be addressed to:

Ernest A. Regna  
Chief, Solid Waste Branch  
Air and Waste Management Division  
U. S. Environmental Protection Agency, Region II  
26 Federal Plaza  
New York, NY 10278

with copies to:

- Richard A. Baker  
Chief, Permits Administration Branch  
U. S. Environmental Protection Agency, Region II  
26 Federal Plaza  
New York, NY 10278

and

- James Heil  
Regional Solid Waste Engineer, Region 1  
New York State Department of Environmental Conservation  
Building 40  
State University of New York  
Stony Brook, NY 11790

You must include your EPA identification number on all correspondence.

Should you have questions about this Notice or should you wish to discuss this matter further, please contact Stanley Siegel of my staff at (212) 264-9638. A copy of the inspection report is enclosed.

Sincerely yours,

Ernest A. Regna  
Chief  
Solid Waste Branch

Enclosure

- cc: David Mafriqi, Chief,  
Bureau of Hazardous Waste Operations, NYSDEC, w/o encl.
- James Heil  
Regional Solid Waste Engineer, Region 1, NYSDEC, w/o encl.
- bcc: Stanley Siegel, 2AWM-SW w/encl.  
Richard A. Baker, 2PM-PA w/o encl. ✓

FRANCIS T. PURCELL  
COUNTY EXECUTIVE



LUDWIG C. HASL, P.E.  
COMMISSIONER

COUNTY OF NASSAU  
DEPARTMENT OF PUBLIC WORKS  
MINEOLA, NEW YORK 11501

August 15, 1983

Raman S. Iyer  
Holzmacher, McLendon & Murrell  
125 Baylis Road  
Suite 140  
Melville, N. Y. 11747

Dear Raman:

We have completed our review of the weekly laboratory reports on John Hassall waste water discharges and have found them satisfactory. In light of this record, we recommend that the frequency of self monitoring by John Hassall be reduced from weekly to once a month. The following parameters are required to be monitored.

Aluminum  
Hexavalent Chromium  
Total Chromium  
Chloride  
Copper  
Iron  
Silver  
Sulfide  
Fluoride  
Chemical Oxygen Demand  
NH<sub>3</sub> - Nitrogen  
Total Dissolved Solids  
Oil and Grease  
pH

Please note that chloride was added to the list of parameters requested in your letter of July 29, 1983. The monthly analysis results of the self monitoring are to be sent to my attention. To be included with the report would be the weekly flowmeter readings for that month.

Very truly yours,

Matthew F. Foster

Asst. Superintendent of Sanitary Engineering

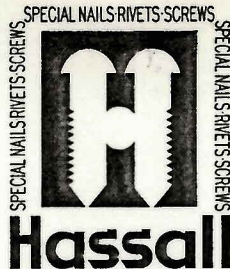
MFF:ab

cc: F. J. Flood

M. Osman

Karl Horlitz, John Hassall ✓





ESTABLISHED 1850

JOHN HASSALL, INC. · WESTBURY · LONG ISLAND · N.Y. · 11590

Tel. 516 · 334-6200 • Telex No. 144585

November 1, 1983

ED303  
Mr Ernest A. Regina  
Chief Solid Waste Branch  
Air and Waste Management Division  
U.S. Environmental Protection Agency Region II  
26 Federal Plaza  
New York, N.Y. 10278

EPA NO. NYD002045417

Mr. Ernest A. Regna;

I am in receipt of your "Consent Agreement and Consent Order" as acknowledged by signature for certified mail dated October 12, 1983.

Due to mis-information, an application to "Store Hazardous Waste" was never forwarded to the Environmental Protection Agency, but only to the Department of Environmental Conservation of New York State. Consequently all of our information and any follow up paper work went only to the DEC.

I have enclosed, for your perusal a copy of our application to the DEC, N.Y. and the supplementary addendums to our permit. That a separate permit was necessary was not known to me. I did receive all permit applications from EPA. I was lead to understand that our application to DEC was one and the same with applying to EPA.

We pride our selves in our Environmental record, and would not knowing fail to meet the regulations.

Please let me know of the need for further information.

Very truly yours,

Karl W. Horlitz  
Karl W. Horlitz, P.E.  
Plant Manager

NOV 4 3 16 PM '83  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
Building 40, State University of New York  
Stony Brook, New York 11794

516-751-7900

May 19, 1983

John Hassall, Inc.  
P.O. Box 698  
Cantiague Rock Road  
Westbury, NY 11590

Re: 10-82-0848,  
Facility 30-H-238

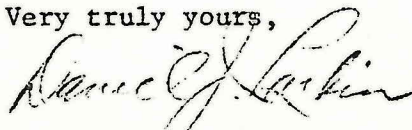
PERMITS ADMIN. BRANCH  
NOV 4 3 16 PM '83  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10001

Dear Sir:

In conformance with the requirements of the State Uniform Procedures Act (Article 70, ECL) and its implementing Regulations (6NYCRR Part 621) we are enclosing your permit. Please read all conditions carefully. If you are unable to comply with any conditions, please contact the Regional Regulatory Affairs Office, NYS Department of Environmental Conservation, State University of New York at Stony Brook, Building 40, Stony Brook, New York 11794.

Also enclosed is a permit sign which you are to conspicuously post at the project site, protected from the weather.

Very truly yours,



Daniel J. Larkin  
Regional Permit Administrator

DJL:11

Encls.

**PERMIT**

Under the Environmental Conservation Law, Article 27, Title 7, Part 360

EXPIRATION DATE  
6/1/86☐ CONSTRUCTION  
☒ OPERATION☒ INITIAL ISSUE  
☐ RENEWAL☐ REISSUANCE  
☐ MODIFICATIONPERMIT NO  
10-82-0848XXXXXX  
3078  
XXXXXX


PERMIT ISSUED TO <b>John Hassall, Inc.</b>		ADDRESS OF PERMITTEE <b>P.O. Box 698 Cantiaque Rock Road Westbury, NY</b>		TELEPHONE NO. <b>(516) 334-6200</b>
LOCATION OF PROJECT Town <b>Oyster Bay</b>		County <b>Nassau</b>		Environmental Conservation Regional Office <b>Stony Brook - Region 1</b>
DESCRIPTION OF PROJECT <b>Storage of hazardous sludge in Industrial Waste Building</b>			ON-SITE SUPERVISOR <b>Karl Horlitz, P.E.</b>	

**GENERAL CONDITIONS**

1. The permittee shall file in the office of the Environmental Conservation Region specified above, a notice on intention to commence work at least 48 hours in advance of the time of commencement and shall also notify said office promptly in writing of the completion of the work.
2. The permitted work shall be subject to inspection by an authorized representative of the Department of Environmental Conservation who may order the work suspended if the public interest so requires.
3. As a condition of the issuance of this permit, the applicant has accepted expressly, by the execution of the application, the full legal responsibility for all damages, direct or indirect, of whatever nature, and by whomever suffered, arising out of the project described herein and has agreed to indemnify and save harmless the State from suits, actions, damages and costs of every name and description resulting from the said project.
4. All work carried out under this permit shall conform to the approved plans and specifications. Any amendments must be approved by the Department of Environmental Conservation prior to their implementation.
5. The permittee is responsible for obtaining any other permits, approvals, easements and rights-of-way which may be required for this project.
6. By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with Part 360 and the special conditions. Any variances granted by the Department of Environmental Conservation to Part 360 must be in writing and attached hereto.

**SPECIAL CONDITIONS**

1. Facility must submit within 90 days a Surety Bond to cover closure costs.

ISSUE DATE <b>5/18/83</b>	ISSUING OFFICER <b>Daniel J. Larkin, RPA</b>	SIGNATURE <b>X</b> 
------------------------------	---	---

PERMITTEE COPY

# NOTICE OF PERMIT

for:

☐

CONSTRUCTION

☒

INITIAL ISSUE

☐

REISSUANCE

☒

OPERATION

☐

RENEWAL

☐

MODIFICATION

has been issued to: John Hassall, Inc.

address: P.O. Box 698, Cantiague Rock Road, Westbury, New York

for a project described as: Storage of hazardous sludge in Industrial Waste Building

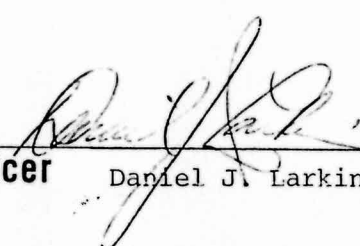
under the Environmental Conservation Law,  
Article 27, Title 7, Part 360 [Solid Waste Management Facilities]

**NOTE:**

- This Notice of Permit must be posted on the project site in such a manner that it is protected from weather and is in a location readily visible to the public.
- A copy of the Permit with the general and special conditions noted thereon will be shown to anyone upon request.

New York State  
Department of Environmental Conservation

47-12-2 (1/82)

  
Issuing Officer

Daniel J. Larkin, RPA

Building 40, SUNY, Stony Brook, NY 11794

Address

10-82-0848

Permit No.

5/15/83  
Issue Date

6/1/86

Expiration Date

Facility No. 30-H-238



Special Instructions for Completion  
of Application Form 47-19-4

- Item 7 If not applicable, mark N/A
- Item 17 Applicants shall check appropriate box or indicate in "other" the nature of the waste facility. i.e. "On site storage of hazardous and/or industrial waste."
- Item 19 For each type of waste listed, please include the following information on that waste:  
Name of waste, rate of generation per month, identify the waste as hazardous or non-hazardous, indicate the maximum amount of waste accumulated prior to disposal.
- Item 20 Include the name(s) of Waste Hauler(s)
- Item 21(a) Omit
- Item 22 Check appropriate box(es)
- Item 23 Signature of company officer or authorized representative and attach proof of authorization.

Your application will be processed only if each of the following forms are included and complete (in some instances an Engineering Report may be necessary). Additional information may be requested by the New York State Department of Environmental Conservation.

- |          |   |
|----------|---|
| <u>✓</u> | 1. Application for "Approval to Operate" (Form 47-19-4) |
| <u>✓</u> | 2. Plot Sketch  |
| <u>✓</u> | 3. Material Flow Sketch                                 |
| <u>✓</u> | 4. Project Permit Requirement Questionnaire             |
| <u>✓</u> | 5. Environmental Assessment Form                        |

ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10001

NOV 4 3 16 PM '88

RECEIVED  
NOV 4 1988

21

APPLICATION FOR APPROVAL TO OPERATE  
A SOLID WASTE MANAGEMENT FACILITY

PROJECT NO.

DATE RECEIVED

DEPARTMENT ACTION

DATE

☐ Approved ☐ Disapproved

SEE APPLICATION INSTRUCTIONS ON REVERSE SIDE

1. OWNER'S NAME <b>Theodore B. Smith Jr.</b>	2. ADDRESS (Street, City, State, Zip Code) <b>Count Rumford Lane Lloyd Neck NY 11743</b>	3. Telephone No. <b>549-25</b>
4. OPERATOR'S NAME <b>Victor Palese</b>	5. ADDRESS (Street, City, State, Zip Code) <b>171 Blueberry Lane Hicksville, NY 11801</b>	6. Telephone No. <b>6 -095</b>
7. ENGINEER'S NAME <b>H2M CORPORATION</b>	8. ADDRESS (Street, City, State, Zip Code) <b>125 Baylis Rd Melville, NY 11747</b>	9. Telephone No. <b>752-9060</b>
10. ON-SITE SUPERVISOR <b>Karl W. Horlitz, P.E.</b>	11. ADDRESS (Street, City, State, Zip Code) <b>11 High Point Rd Settlers Landing East Hampton, NY 11937</b>	12. Telephone No. <b>324-2181</b>

13. HAS THE INDIVIDUAL NAMED IN ITEM 10 ATTENDED A DEPARTMENT SPONSORED OR APPROVED TRAINING COURSE?  
☐ Yes Date Course Title Location ☐ No

see attached sheet

14. PROJECT/FACILITY NAME <b>John Hassall, INC-Industrial Waste Bldg Nassau</b>	15. COUNTY IN WHICH FACILITY IS LOCATED <b>Nassau</b>	16. ENVIRONMENTAL CONSERVATION REGION <b>2</b>
17. TYPE OF PROJECT FACILITIES: <input type="checkbox"/> Composting <input type="checkbox"/> Transfer <input type="checkbox"/> Shredding <input type="checkbox"/> Baling <input type="checkbox"/> Sanitary Landfill <input type="checkbox"/> Incineration <input type="checkbox"/> Pyrolysis <input type="checkbox"/> Resource Recovery-Energy <input type="checkbox"/> Resource Recovery-Materials <input type="checkbox"/> Other <u>Storage of hazardous sludge</u>		
18. HAS THIS DEPARTMENT EVER APPROVED PLANS AND SPECIFICATIONS AND/OR ENGINEERING REPORTS FOR THIS FACILITY? <input type="checkbox"/> Yes <input type="checkbox"/> No Date <u>September 1972</u>		

19. LIST WASTES

SEE SEPARATE SHEET

20. BRIEFLY DESCRIBE OPERATION

SEE SEPARATE SHEET

21. IF FACILITY IS A SANITARY LANDFILL, PROVIDE THE FOLLOWING INFORMATION:

a. Total useable area: (Acres)

Initially \_\_\_\_\_ Currently \_\_\_\_\_

b. Distance to nearest offsite, downgradient, water supply well \_\_\_\_\_ Feet

c. No. of groundwater monitoring wells

Upgradient \_\_\_\_\_ Downgradient \_\_\_\_\_

22. INDICATE WHICH ATTACHMENTS, IF ANY, ARE INCLUDED WITH THIS APPLICATION:

☐ Form 47-19-2 or SW-7 ☐ Operations Plan & Report ☐ USGS Topographic Map ☒ Record Forms  
☐ Construction Certificate ☐ Boring Logs ☒ Water Sample Analysis ☐ None ☐ Other \_\_\_\_\_

23. CERTIFICATION:

I hereby affirm under penalty of perjury that information provided on this form and attached statements and exhibits is true to the best of my knowledge and belief. False statements made herein are punishable as a Class A misdemeanor pursuant to Section 210.45 of the Penal Law.

September 17, 1982

Date

Signature and Title

Theodore B. Smith Jr. President

APPENDIX B  
SHORT ENVIRONMENTAL ASSESSMENT FORM

INSTRUCTIONS:

(a) In order to answer the questions in this short EAF it is assumed that the preparer will use currently available information concerning the project and the likely impacts of the action. It is not expected that additional studies, research or other investigations will be undertaken.

(b) If any question has been answered Yes the project may be significant and a completed Environmental Assessment Form is necessary.

(c) If all questions have been answered No, it is likely that this project is not significant.

(d) Environmental Assessment

1. Will project result in a large physical change to the project site or physically alter more than 10 acres of land?.....        Yes   X   No
2. Will there be a major change to any unique or unusual land form found on the site?.....        Yes   X   No
3. Will project alter or have a large effect on an existing body of water?.....        Yes   X   No
4. Will project have a potentially large impact on groundwater quality?.....        Yes   X   No
5. Will project significantly effect drainage flow on adjacent sites?.....        Yes   X   No
6. Will project affect any threatened or endangered plant or animal species?.....        Yes   X   No
7. Will project result in a major adverse effect on air quality?.....        Yes   X   No
8. Will project have a major effect on visual character of the community or scenic views or vistas known to be important to the community?.....        Yes   X   No
9. Will project adversely impact any site or structure of historic, prehistoric, or paleontological importance or any site designated as a critical environmental area by a local agency?.....        Yes   X   No
10. Will project have a major effect on existing or future recreational opportunities?        Yes   X   No
11. Will project result in major traffic problems or cause a major effect to existing transportation systems?....        Yes   X   No
12. Will project regularly cause objectionable odors, noise, glare, vibration, or electrical disturbance as a result of the project's operation?.....        Yes   X   No
13. Will project have any impact on public health or safety?        Yes   X   No
14. Will project affect the existing community by directly causing a growth in permanent population of more than 5 percent over a one-year period or have a major negative effect on the character of the community or neighborhood?        Yes   X   No
15. Is there public controversy concerning the project?        Yes   X   No

PREPARER'S SIGNATURE Paul W. Hassall, P.E. TITLE: Plant Manager

REPRESENTING JOHN HASSALL, INC DATE: August 26, 1982

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
PROJECT PERMIT REQUIREMENT QUESTIONNAIRE

The purpose of this questionnaire is to assist the applicant in determining what, if any Department Permits or approvals must be obtained before starting work on a proposed project. If you are not sure if the action proposed is a regulated activity or is within an area subject to Department regulations (tidal wetlands, freshwater wetlands, etc.) contact our regional office for clarification. A pre-application conference with our staff to obtain guidance in the Department's permit application review process can be arranged.

ANSWER ALL QUESTIONS

NAME OF APPLICANT: JOHN HASSALL INC

DETAILED PROJECT DESCRIPTION & LOCATION: STORAGE OF HAZARDOUS WASTE.

JOHN HASSALL, INC CANTIAGUE ROCK ROAD, WESTBURY, LI NEW YORK 11590

	YES	NO	NOT KNOWN
1. <u>Realty Subdivision Approvals in Nassau County</u> Does project involve subdivision of land into 5 or more residential lots that will be served by a public or community sewage disposal system?		<u>x</u>	
2. <u>Mining Permit</u> Does project involve the mining and commercial sale or offsite use of 1,000 tons of mineral within 12 calendar months (excepting excavation or grading in connection with onsite construction or farming)?		<u>x</u>	
3. <u>Air Contamination Permit</u> a) <u>New or Modified Sources:</u> Does project involve the construction, modification or operation of a boiler greater than 1 million BTU/hr rated heat input, an incinerator or an industrial process.		<u>x</u>	
b) <u>Indirect Source:</u> Does project involve construction or modification of a highway, airport or a parking facility with 250 or more spaces?		<u>x</u>	
4. <u>Solid Waste Management Permit</u> Does project involve the storage, transfer, processing or disposal of solid waste?	<u>x</u>		
5. <u>Wild, Scenic &amp; Recreational Rivers Permit</u> Only applies to certain lands within a 1/4 mile of the Carmans River. Consult DEC Regional Office for exact determination.		<u>x</u>	



	<u>YES</u>	<u>NO</u>	<u>NOT KNOWN</u>
6. <u>Water Supply Permit</u> Does project involve the acquisition of land or construction of facilities for water supply or distribution purposes?	_____	<u>X</u>	_____
7. <u>Long Island Well Permit</u> a) Does project involve the construction of a new well or deepening or increasing the capacity of an existing well to withdraw water at a rate greater than 45 gallons a minute?	_____	<u>X</u>	_____
b) Will project require the temporary lowering of groundwater levels for construction purposes?	_____	<u>X</u>	_____
8. <u>Protection of Waters</u> a) Will project change, modify or otherwise disturb the course, channel or bed of any stream classified C(T) or higher? (Consult the Regional Office for classifications.)	_____	<u>X</u>	_____
b) Does project involve the temporary or permanent artificial obstruction of a natural stream or watercourse?	_____	<u>X</u>	_____
c) Does project involve the construction or repair of a permanent dock, pier or wharf having a top surface area more than 200 square feet?	_____	<u>X</u>	_____
d) Does project involve any excavation or placing of fill in the navigable waters of the State and adjacent wetlands?	_____	<u>X</u>	_____
9. <u>Tidal Wetlands Permit</u> I. Will project be located: a) in tidal waters b) within 300 feet of either the landward edge of a tidal wetland boundary or a tidal body of water?	_____	<u>X</u>	_____
II. Will there be any subdivision of land or physical alterations of land or water?	_____	<u>X</u>	_____
Exemptions to the above regulated locations if: 1) Project will be located at a ground elevation of 10 feet or higher above mean sea level (excepting on the face of a bluff or cliff.)	_____	<u>X</u>	_____
2) A substantial, man-made structure (such as a paved street or bulkhead) 100 feet or longer exists between the project site and tidal wetlands or tidal water. (Consult DEC Regional Office, if unsure.)	_____	<u>X</u>	_____
10. <u>Freshwater Wetlands Permit</u> a) Will project area be within, or within 100 feet of, a freshwater wetland or freshwater body of 12.4 acres or larger?	_____	<u>X</u>	_____
b) Will project involve draining, dredging, filling, excavating, erecting structures, roads, utilities or other alterations or placing any form of pollution in a wetland? (Consult DEC Regional Office, if unsure.)	_____	<u>X</u>	_____

- |   | <u>YES</u> | <u>NO</u> | <u>NOT<br/>KNOWN</u> |
|---|------------|-----------|----------------------|
| 11. <u>Section 401 - Water Quality Certification Letter</u><br>Does project or activity require a Federal Permit or License? If so, this State certification may be required prior to Federal approval. | _____      | <u>X</u>  | _____                |
| 12. <u>State Pollutant Discharge Elimination System (SPDES) Permit</u><br>Does project involve:   |            |           |                      |
| a) A proposed subdivision of 5 or more units?   | _____      | <u>X</u>  | _____                |
| b) A proposed or existing discharge of 1,000 gallons per day of sewage or any discharge of industrial or other wastes to ground waters?   | _____      | <u>X</u>  | _____                |
| c) Any discharge of sewage, industrial or or other wastes to surface water?   | _____      | <u>X</u>  | _____                |
| d) Any disposal of stormwater containing sewage industrial or other wastes?   | _____      | <u>X</u>  | _____                |
| e) Any storage and disposal of potentially toxic or hazardous wastes?   | <u>X</u>   | _____     | _____                |
| 13. The following additional required DEC permits have been applied for:  | _____      | _____     | <u>N.A.</u>          |

<u>Type of Permit</u>	<u>Applic. No.</u>	<u>Application Filing Date</u>	<u>Applicant's Name (If different from application now being submitted.)</u>
-----------------------	--------------------	--------------------------------	--

14. List all other permits, licenses or approvals required by other agencies of government:

<u>Type of Permit or Approval</u>	<u>Governmental Agency</u>	<u>Status</u>
-----------------------------------	----------------------------	---------------

I certify that the above information is correct to the best of my knowledge.

September 17, 1982

DATE

THEODORE B. SMITH, JR.

SIGNATURE OF APPLICANT OR AUTHORIZED REPRESENTATIVE

John Hassall has been treating the industrial effluent generated by the various processes and cleaning procedures that are utilized in our special cleaning and finishing department since 1974.

The sluges resulting from the cleaning effluents from manufacturing these special fasteners are the by-products of degreasing and cleaning these parts after they have been headed or upset on the machinery. In order to facilitate the feeding of these parts through secondary operations, these parts have to be clean, brite and dry, so as to negotiate the tracks and feeding devices designed to enhance automatic handling or indexing through the equipment.

A small percentage of our products are nickel plated in our electroplating equipment. This equipment consists of two 175 gallon plating tanks. Considering an average of 242,500 lbs of product manufactured per month, only 700 lbs of these were plated in our equipment. All other plating requirements are handled through outside vendors. Our plating is utilized for emergency measures only, where delivery time is the dominant factor.

#### Waste Treatment

Our waste treatment process consist of three (3) segregated waste water streams. (Industrial washing machines, oil stripping and mixed metals waste waters), in three (3) below grade pre-cast concrete-fiberglass lined oil separation tanks, each @ 9000 gallons, then pre-settling in three (3) below grade pre-cast concrete fiber glass lined settling tanks each @ 9000 gallons, and fitted with air and CO2 defusers for mixing and PH adjustment.

Waste waters after pre-treatment by oil separation and pre-settling are pumped from three (3) separated concrete wet wells, each fitted with a 100 GPM vertical centrifical pump which delivers each of the waste waters to one of the three interior steel treatment tanks, each with a cpapcity of 10,000 gallons. Each treatment tank contains a vertical paddle wheel flocculator, air and CO2 diffusers and oil skimming over flow weirs, and variable take off effluent drains.

The first treatment consists of the addition to the effluent as follows: Calcium Hydroxide ( $\text{Ca}(\text{OH})_2$ ), Sodium Sulfide ( $\text{Na}_2\text{S}$ ), Calcium Chloride ( $\text{CaCl}_2$ ), Carbon Dioxide ( $\text{Co}_2$ ) and cationic and non ionic poly electrolyte. The effluent is flocculated and allowed to settle overnight.

The following day, this pre-treated effluent is transferred by pump into tank #2 for the second treatment.

The second treatment consists of the addition to the pre-treated effluent as follows:

Activated carbon, Aluminum Sulfate ( $\text{Al}_2 (\text{So}_4)_3$ ) and an ionic poly electrolyte. This is Flocculated for thorough mixing and allowed to settle overnight. The following day this treated effluent is pumped through the plate and frame shriver filter (this filter was previously prepared and charged with Diatomicious earth, super cell and sorbo-cell)

This will filter out the remaining suspended solids, oil and grease. The effluent is then treated with (H<sub>2</sub>O<sub>2</sub>) Hydrogen peroxide for sulfide destruction and pumped into the below grade holding tank, equipped with Aeration devices to prevent an anaerobic state from occurring.

The effluent is now tested thru the atomic absorption system, and if sewer discharge limitations are met for all parameters, this effluent is pumped into the sewer system. All discharges are recorded on a tamper proof flow meter, monitored and tested by the Nassau County Department of Public Works Cedar Creek Laboratory and evaluated against an Independent Laboratory Analysis by H2M.



OUR HAZARDOUS WASTES

- 1- Spent Stoddard Solvent combined with both cutting and lubricating oils  
(these oils may contain sulfur, paraffin base oils, combined chlorine and phosphorous.)
- 2- Degreasing Solvents
  1. chlorinated safety solvents
  2. spent freon
  3. VG 1.1.1
- 3- Salt Solutions  
From electro chemical grinding. May contain Sodium Nitrite, Sodium Nitrate, and Rochelle Salts.
- 4- Spent Diatomite - (filter aid) containing small amounts of carbon, oil or grease and trace metals. (Fe, Ni, Cr, Cu, Zn

## BACKGROUND OF WASTE TREATMENT PLANT PERSONNEL

Victor Palese is currently enrolled in Nassau Community College. He is a Science Major and is studying Environmental Science and Chemistry.

He has attended classes by Perkins-Elmer on operating the Atomic Absorbtion Equipment.

As our Industrial Waste Treatment Plant Operator, he has worked with Chemical Management Inc. in capacity of identifying Hazardous Waste (oils, solvents, sludges, etc).

He has received special instruction in the Laboratory regarding specific areas by H2M personnel.

He has been involved in Industrial Waste Treatment for three years and labored to meet the Nassau County parameters for the discharge of our Industrial Waste into the sewer system.

Our Manufacturing processes result in approximately 4 to 5 55 gallons drums per week of Hazardous waste. At the present time we are storing these drums, on pallets, in our warehouse. These drums are accumulated until we have about 12 to 15 of them. At that time a properly Registered Scavanger pickup is made for disposal.

The warehouse storage facility is secured and locked. Access is only thru Department necessity and authorized personnel. It is a total area of 20,000 square feet. Its main purpose is to store raw material (wire) and prepackaged finished goods (nails, rivets, screws) in bulk. These are stored in cartons, packed on a pallet, and placed on a storage rack four (4) to five (5) tiers high. A special area has been designated for the hazardous waste storage. The area is totally sprinklered. The containment of a leak or spill would be done thru Floor-Dri pickup. Fire extinguishers are also available.

The containers in which this Hazardous Waste is stored (are when necessary), lined with a plastic insert of 3 mils thickness, and secured with the proper drum cover, sealed and labeled, numbered and coded for identification in accordance with Department of Transportation Regulation 49CFR, Part 172.

These drums will be stacked no more than two (2) high (if this should ever become necessary). They will stand a minimum of five (5) inches off the floor and placed two (2) on each pallet, sized (36"x42"x5 1/2") they shall stand clearly visible to the eye, so as to be easily inspected for leak detection or drum rupture.

#### HOW WE HANDLE OUR SOLID WASTE

After our effluent has been treated in our treatment tanks, and filtered through the Shriver Plate and Frame Filter Press, the treatment plant operator opens the filter press and removes the spent diatomite from the curtained frames. Approximately 200 lbs of Filten aid are used per Filten. This solid waste is directly placed into 55 gallon steel drums which have been lined with a mil liner, and placed in a holding area within our warehouse. Other solid waste include our Metal Hydroxide Sludges; a by product of our treatment process. These sludges consist of carbon-lime-sulfide and precipitated metatls (Fe, Ni, Cr, Cu, Zn,).

These sludges are directly routed from our treatment tanks to a below grade, non-leaching sludge Holding Tanks via sealed pipeline engineered for this purpose.

From here, RGM (carrier #18A033) EPA I.D. No. NY0050592807 972 Nicolls Road, Farmingdale, N.Y. utilizes a vacuum truck, purchased from Super Products Registered (DIA-REO) capable of holding 15 cubic yards of solid waste.

It is transported to:

G.R.O.W.S. Inc  
Bordentown and New Ford Mill Roads  
Morrisville, Pennsylvania 19067

E.P.A. I.D. NO. PA D 000429589

All manifest are recorded, filed and mailed to the proper authorities.

LIST OF PERMIT NUMBERS

John Hassall, Inc 516-334-6200  
Cantiague Rock Road  
Westbury, N.Y. 11590

SPDES Permit No. NY D07 6287  
EPA Permit No. NY 000 2045417

Certified Waste Oil- Jim Hack 516-352-6194  
320 Courthouse Road  
Franklin Square, L.I., N.Y. 11010

DEC NY Permit No. IA-052  
Vechile License No. 56626 GB

RGM Liquid Waste Removal Corp 516-586-0002  
972 Nicolls Road  
Deer Park, N.Y. 11729

EPA Permit No. NYD 050592807  
DEC NY Permit No. 1A-033

Callia Bros 1-212-387-8300  
362 Masbeth Avenue  
Brooklyn, N.Y. 55211

EPA Permit No. NYD 980647283

Chemical Management Inc 516-454-6766  
340 Eastern Parkway  
Farmingdalt, NY 11735

EPA Permit No. NYD 000691949



## PRESENT PLANT OPERATIONS

John Hassall, Inc., is a long-time established company engaged in the manufacture of specialized or "Job Designed" fasteners, nails, screws and rivets.

The present company was established in 1888 to produce nail machines, hardware, nails and screws. The Company was located in New York City until 1953 when it moved to the present location in Westbury, Nassau County, New York.

Present plant operations include the handling of various metallic wires from which the fasteners are made, cold heading or the forming of the required shape of the fastener and various other secondary operations such as threading, fluting, knurling, slotting, drilling, tapping, turning, grinding and trimming of fasteners. The above mentioned operations result in no appreciable amounts of industrial waste water and are limited to mostly solid wastes consisting of metallic filing or chips. These wastes generally do not present any disposal problem as they are collected in containers and disposed of by a solid waste removal service. (Metal scrap pick-up).

Industrial waste waters originate from deburring, burnishing, cleaning and plating operations. The expended process solutions and rinse waters from these operations comprise the industrial waste waters mentioned in this report.

## EXISTING OPERATIONS AND WASTE WATER SOURCES

The waste waters are composed of primarily expended cleaning solutions and wash waters from the cleaning and plating operations.

### WASHING OF FASTENERS

High speed manufacturing of fasteners requires a petroleum base lubricant on the wires to aid the feeding of the wire through the dies of the forming machines. After the forming operations, many of the fasteners receive a final washing and coating with a rust inhibitor. Presently, this washing and protective coating is performed in a large industrial washing machine. This washing machine operates as two (2) closed systems, where all wash and rinse waters are recycled to holding reservoirs for re-use. The wash reservoir has an approximate capacity of 500 gallons, whereas the rinse reservoir has a 350 gallon capacity.

### CLEANING OF FASTENERS

Small fasteners cannot be cleaned in the industrial washing machine, and are cleaned instead in barrel tumblers to remove oils and soils.

## POLISHING OF STAINLESS STEEL

Many stainless steel fasteners receive heat treatment after the forming operations. Heat treating leaves metallic scales on the fasteners which must be removed. This removal is accomplished by barrel tumbling.

## NICKEL PLATING

A number of fasteners are nickel plated in any one of five (5) nickel plating tanks. Fasteners are first cleaned in the industrial washing machine or barrel tumblers. Fasteners are placed in rotating barrels or baskets and immersed in nickel sulfate solutions in the nickel plating tanks. Presently, no dragout, static or running rinse tanks exist. Washing of plated parts is currently performed by removing the barrels or baskets from the plating tanks and flushing them with water on the plating room floor.

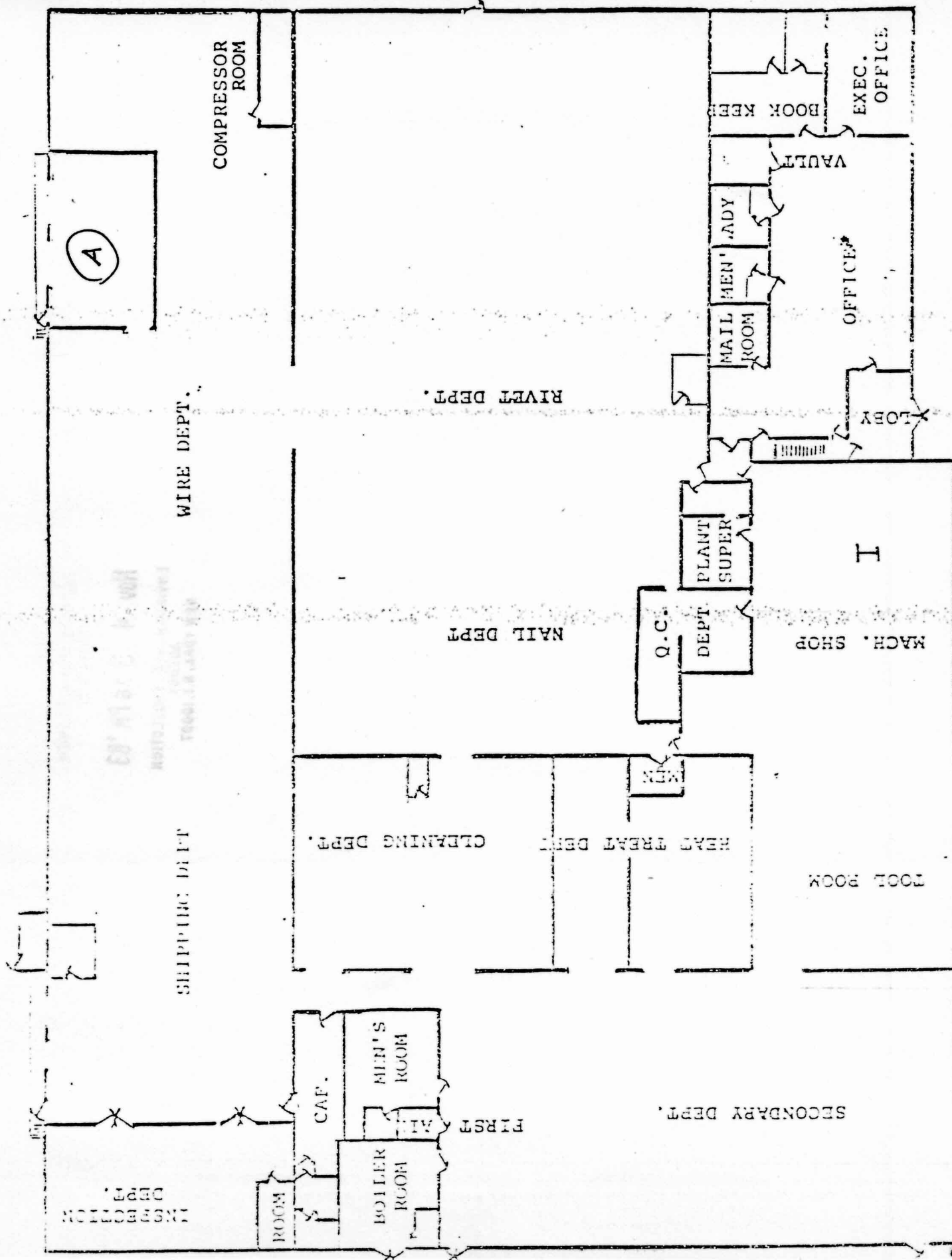
## MATERIAL FLOW

Raw materials, in the form of coils of wire, and consisting of varied metals are delivered to the raw material (wire) storage. (A) From this storage area, the wire is delivered to the various machines, as requested by the Nail and Rivet Manufacturing Departments.

At the machines, the wire is cut to length, and upset to the customers specifications. These parts are inspected and the finished parts dumped into a fiber glass collection pan, and weighed at 50 lbs. The orders are stacked on pallets, which through lift truck operations, are delivered to the Cleaning Department.

From the Cleaning Department the work may be scheduled for secondary operations, heat treating, plating or shipping.

Upon reaching the Shipping Department, parts are final inspected, packed stacked and racked for storage or made ready for shipment to the customer.





This suppliment sheet is in answer to the letter we have received dated November 4, 1982, for which there was expressed a need for clarification of a number of the requirements for a solid waste storage facility permit. The application at that time as received was accompanied by directives from Nassau County Department of Health, which had outlined a fairly simple set of instructions to follow, and the information necessary to make out this application. In the meantime, I had requested and received from New York State Department of Environmental Conservation the Hazardous Waste Manifest Guidance Manual, and Part 360,365,366 of 6 NYCRR. Due to unforeseen circumstances, the additional information that was requested, had to be postponed.

In answer to the question regarding the Chromium our laboratory reports which analyze the waste prior to discharge into the County Sewer Systems have to date reported acceptable amounts of Chromium in the effluent stream. The highest level of Chromium being 0.29 as compared to the maximum acceptable level of 2.0 has been reported. That means our effluent, post treatment, has less than one half (1/2) P.P.M. of Chromium as compared to the 2.0 that is allowable. The sewer effluent is monitored by the Nassau County - Town of Oyster Bay Department of Public Works. For our interest, - H2M Corporation also monitors our discharge to the Sewer System. The samples are collected and tested prior to discharging the effluent into the sewer system. Our Laboratory Manager Victor Palese, also tests for specific parameters as outlined by the County Treatment Facility and monitored by Maurice Osman.

In reference to part 360.8 (C) (3) Contingency Plan, and Closure Plan; Part 360.8 (C) (6) in reference to financial requirements:

The solid waste storage area is marked with a sign "DANGER- UN-AUTHORIZED PERSONNEL KEEP OUT." Access to our warehouse is with key only to authorized personnel.

The solid waste storage area, our Industrial Waste Treatment building and the Laboratory are inspected for possible equipment deterioration or failure, and a report is forwarded to the Plant Manager.

The Solid Waste Management Facility is located on a reinforced concrete floor, inside a brick building. This building is also the raw material and finished goods storage area. A specific area, marked, outlined and designated as the solid waste storage or hold area is located in this warehouse. The sludge is stored in lined 55 gallon drums, on pallets and located beneath a fully fire sprinklered area. Fire extinguishers are also located nearby. The amounts of stored drums would be no more than a months collection, or three drums of filter cake per week from our plate and frame filter, and possibly some solvents mixed with water, or oils mixed with water. These

drums are constantly being monitored by our Laboratory Manager Victor Palese and the Plant Manager. Any spills, leaks or ruptures would be contained by applying floor dry in abundant amounts, which can encircle the leak like a dam, and also soak up the spillage. There is no leachate danger present to outside grounds and none of the stored solid waste is subject to salvage on our site.

The roadway and driveway that encircle our Industrial Complex are always kept in the best of repair, and kept free of ice and snow, or any road hazard.

Our personnel are provided with all the necessary safety equipment, and means necessary to accomplish their work.

All employed personnel of John Hassall are covered by Workmen's Compensation:

Workmens Compensation Carrier

State Insurance Fund	Telephone - 516-538-7800
159 No. Franklin Street	
Hempstead, N.Y. 11550	Police Number 480-529-7

Coverage in the event of emergencies - sudden or non-sudden releases of hazardous waste:

Basic General comprehensive liability coverage

Kemper Insurance Co  
Policy Number 2 ZT/VS 026 527

Blanket comprehensive liability coverage

U.S. Insurance Group  
Policy Number 523 190 6298

Insurance Broker: Cooroon and Black Co  
150 William Street  
New York, N.Y. 10038

The litter on our grounds and adjacent to the solid waste storage area would be kept to a minimum as the plant maintenance crew keeps this in check, and sees to it that wind blown debris and loose papers are confined to the refuse roll-off dumpster. Odors are controlled by the use of a peroxide feeder during the treatment process. Noise is kept to a minimum. All of our employees use noise protection when necessary,

Ours is a well run safe shop, and OSHA oriented. Our Hi-Los and Forklift trucks are under a service contract to Clarks Lift, which maintains them in safe working order, oiled, greased and ready. These trucks are sheltered in our warehouse facility and kept in readiness. There has never been open burning of any articles, waste rubbish or materials on this site. It is prohibited to do so.

For the present and past years, The John Hassall Inc Waste Treatment and Solid Waste Storage Facility has been maintained in excellent operating order. All required paper work for the varied agencies, be they County, State or Government have been forwarded to the proper office, recorded in the correct manner, and the copies provided to wherever necessary. The facility does not endanger wildlife, fish, land or water resources, flood planes or human life.

The facilities shall be maintained and operated so as to function in accordance with the permit when issued, and the designed and intended use of the facility. All equipment in use in this facility shall be maintained to operate effectively.

A contingency plan approved by the Department of Environmental Conservation for any and all emergency situations shall be implemented in accordance with the plans terms as outlined here in.

#### CONTINGENCY PLAN PART 360.8 (C) (3)

Telephones available for emergency calls in the Waste Treatment Building, the Laboratory and in the Warehouse storage area. In an emergency the Emergency Co-ordinators will immediately determine the nature and extent of the problem - and impliment the necessary steps to contain the spill or fire and summon the necessary assistance. In the event that the Emergency-Coordinator is not available, the Emergency Group Leader will be called. It would be his responsibility to assess the situation and to take immediate steps as outlined in the plan, and call the Plant Manager. The Emergency Group Leader is the person assigned to supervise the Solid Waste Storage area.

Upon any emergency situation- of a fire, explosion, or any unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water, the following directives should be followed and adhered to.

In the event of a fire on the premises, by or near the solid waste management site, the emergency fire department number shall be called, 931-0898. The Fire Chief Lawrence Bachteler Sr. shall be notified. If in the event he is not there 1st Deputy Robert Zederham or 2nd Deputy Douglas Herin shall be called and given the details of the emergency, the nature and extent thereof, and the steps immediately being taken by the Hassall Emergency Group to contain this emergency. At that time the police emergency number shall be called 911, 364-0500 and the 2nd precinct, Inspector Miglino, notified and given the specific details concerning the emergency. The Hassall Emergency Group consist of the Plant Maintenance Personnel, volunteer firemen of the work force who are trained and proficient with the fire hose use and with the emergency procedures as outlined to them for sudden spills, air contamination, or fire emergencies.

A drum rupture in the solid waste storage area, can be easily and readily contained thru floor-dri use and damming up the area. The soaked floor-dri would then be shoveled into a sound 55 gallon drum, and properly sealed.

MAJOR SUDDEN EMERGENCIES

An emergency situation of a sudden spill, release of hazardous waste which would threaten human life such as wherein a tank ruptures, or a hose from a tank truck fails, fires and explosions also would constitute an emergency situation.

WHAT TO DO

An immediate call would be to the Emergency Co-ordinator who would in turn notify the emergency groups thru the emergency group leader. The first step would be containment, and isolation of the spill or fire. Fire extinguishers or hydrant hoses are available. In the event of an explosion wherein there could be injuries to life and limb the hospital would also be notified, and proper transport for the injured provided for.

*Karl W. Horlitz*

Karl W. Horlitz, P.E.  
Plant Manager



CLOSURE AND POST CLOSURE 360.8 (C) (6)

The closure plan as herein defined is in reference to the present Solid Waste Storage Facility. As outlined in the forgoing contingency plan, the amount of stored solid waste would be approximately a twelve (12) 55 gallon drums maximum lot.

Included in the plan would be any residuals of sludges in the treatment tanks, and a possible residue from the decontaminating of the tank interiors. Also, a below grade sludge holding tank, which accumulates sludges from the treatment tanks. Altho the below grade tanks are not included in solid waste storage area as such; it is assumed for the purpose of this permit application, that a closure of the facility, would include tank clean out.

The hauler of solid waste RGM and Chemical Management would pick up the Solid Waste drums stored in the warehouse, and also pump out the below grade holding tanks. Wastes such as water and oil mixes and ignitibles would be picked up by Techtronics Inc for disposal at their site. LaMay and Sons would fill the tanks with clean fill or sand. Martone and Sons would level the tank tops below grade to allow for topsoil and grass. The costs for the above are listed below.

The 90 day period for closure for the above activities are within the limits estimated by contractors and John Hassall Inc. to complete final treatment and the sludge pickups for disposal, and removal from the site.

The certificate of closure shall be applied for when closure is completed. The owner and independent Registered Professional Engineer will certify that the closure of the facility has been completed in accordance with the specifications outlined in the approved closure plan.

*Karl W. Horlitz*

Karl W. Horlitz, P.E.  
Plant Manager

PLANT EMERGENCY GROUP

Edward J. Dasczynski  
113 Rension Drive  
Westbury, L.I., N.Y. 11590  
516-333-4421

William Haley  
14 Sourth Haven Drive  
East Northport, LI NY 11713  
516 499-2701

Charles Janovsky  
477 Merrick Road  
Lynbrook, LI NY 11563  
516-887-4947

George Loizidis  
805 Hawkins Ave  
Lake Ronkonkoma, LI NY 11779  
516-467-1617

Harry McDonald  
120 Woodside Road  
Mastic Beach, LI, NY 11951  
516-399-6010

Victor Palese  
171 Blueberry Lane  
Hicksville, LI NY 11801  
516 681-0958

Salvadore Rozza  
15 Crescent Street  
Selden, LI, NY 11784  
516-864-2117

Joseph M. Wlcek  
3661 Lark Street  
Levittown, LI, NY 11756  
516 796-2246

Charles E. Morrell  
98 Valley Drive  
Sound Beach, LI NY 11789  
516-821-0593

Kevin Marsh  
257 Tyler Avenue  
Miller Place, LI NY 11764  
516 821-9018

Anthony Napoli  
5 Valmont Lane  
Commack LI NY 11725  
516 543-2049

Harry S. Olsen  
16A Baker Street  
West Babylon, LI NY 11704  
516 661-3578

Louis F. Scarnato  
690 Newbridge Avenue  
East Meadow, LI NY 11554  
516 481 7454

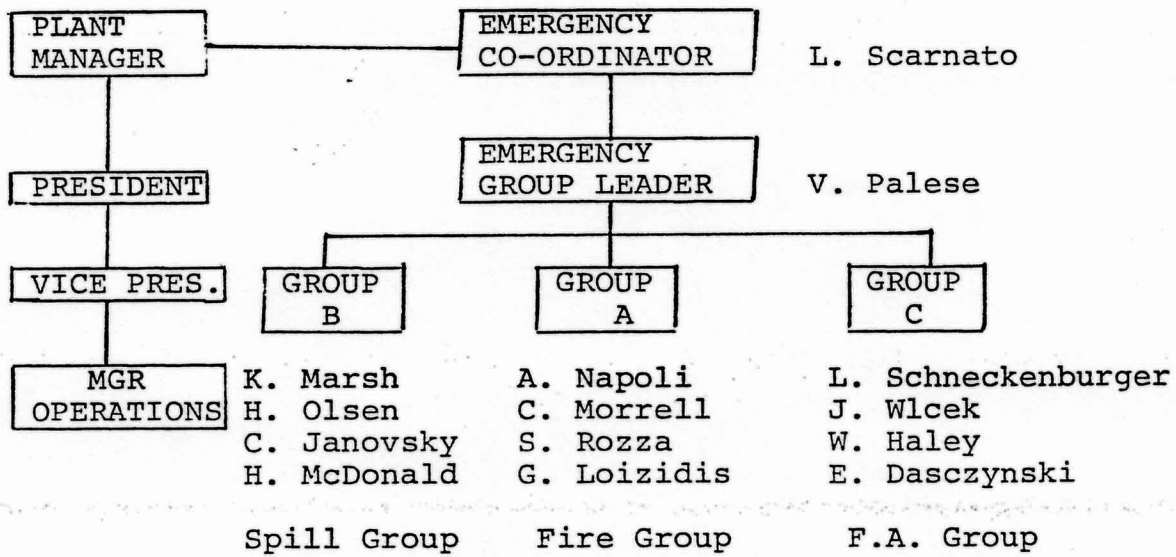
PLANT SECURITY

Gustaf Alm  
58 East 17 Street  
Huntington LI NY 11746  
516 HA 7-9244

Carmen J. Fischetto  
2296 Spruce Street  
Seaford, LI NY 11783  
516 781-9394

Charles Syfferd  
160 Bond Street  
Westbury, LI, NY 11590  
516 334-4447

CALL PRIORITIES



PLANT AND GROUNDS SECURITY

Gustaf Alm

Carmen J. Fischetto

Charles Syfferd

## WASTE ANALYSIS PLAN

The constituents of all hazardous waste generated by John Hassall, Inc.; be it waste water or sludge resulting from treatment to this water, or oily waste, which is contained in drums (for off site disposal) remains the same although quantities of these known substances will differ.

Samples are taken on a "grab" basis and are considered most representatives of the materials in question. Thorough and continuous mixing is achieved by the use of large paddle wheel flocculators within these treatment tanks. Samples are taken off side ports. This sample is then placed into properly labeled sample jars, which have been previously prepared by an Independent Laboratory (H2M) for forwarding to them for analysis. A test method sheet has been enclosed.

All raw waste water and sludges are currently and routinely being sent for E.P. Toxicity analysis on a semi-annual basis.

Oily waste is currently being analyzed on an annual basis.



October 24, 1983

John Hassall, Inc.  
Cantiague Road  
Westbury, New York 11590

Attn: Vic Polisi

Re: Analytical Methodology

Gentlemen:

As per your request we are providing you with a list of the methods used by our laboratory to analyze your waste water discharge. The methods are described in two sources:

- 1) Standard Methods for the Examination of Water and Waste Water, 14th ed.
- 2) Methods for Chemical Analysis of Water and Wastes, EPA, 1979

Presently we are analyzing the following parameter in your waste water (the method number and appropriate reference are shown to the left of the parameter):

<u>Reference</u>	<u>Method</u>	<u>Parameter</u>
(2)	202.1	Aluminum
(1)	307B	Hexavalent Chromium
(2)	218.1	Total Chromium
(1)	602	Chloride
(2)	220.1	Copper
(2)	236.1	Iron
(2)	272.1	Silver
(1)	428	Sulfide
(1)	414B	Fluoride
(1)	508	Chemical Oxygen Demand
(1)	418 A&D	Ammonia Nitrogen
(1)	208B	Total Dissolved Solids
(1)	502A	Oil and Grease
(1)	424	pH

575 BROAD HOLLOW ROAD, MELVILLE, N.Y. 11747 • 516-694-3040

Established in 1956

Member ACIL



October 24, 1983

If you need any additional information, please contact  
me at this office.

Very truly yours,

H2M Laboratory



Richard B. Lambert  
Chemist

RBL/slb

*[Faint vertical stamp on the left margin: NOV 4 1983, NEW YORK, N.Y.]*

MONTH

## DAILY INSPECTIONS

DATE \_\_\_\_\_

TIME

Exterior Piping  
and Valves  
Junction box-exposed  
pump motors

CO2 Tank and Piping  
Man Hole Covers  
Below Grade Holding  
Tanks

Waste Treatment Bldg.  
Tanks, Piping, Valves  
Chemical Feeders  
Equipment

Laboratory  
Atomic Absorption  
Piping Bottles  
Safety

Chemical Storage  
Area  
Chemicals, Drums  
Materials

Solid Waste Storage  
Area  
Drums, Hi-Dri-Leak  
Containment  
Fire Extinguishers

INSPECTED BY

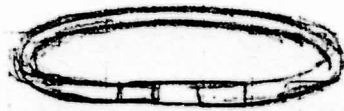
WEEKLY INSPECTION OF FIRE PROTECTION EQUIPMENT

CITY SIDE OF METER  
PLANT " "  
HYDRANT AND HOSE  
WATER PRESSURE  
SPRINKLER ALARM  
FIRE DOORS  
FIRE EXTINGUISHER  
ELECTRICAL EQUIP.  
HOUSEKEEPING

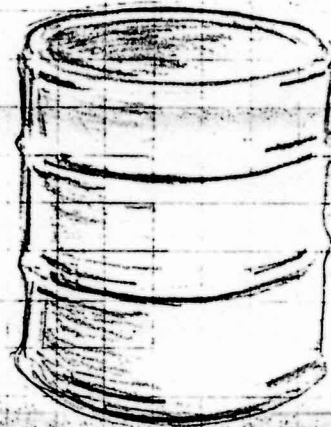




← TOP.



← RING STRAP



← 55 GL. DRUM  
WITH LINER

FRANCIS T. PURCELL  
COUNTY EXECUTIVE



LUDWIG C. HASL, P.E.  
COMMISSIONER

COUNTY OF NASSAU  
DEPARTMENT OF PUBLIC WORKS  
MINEOLA, NEW YORK 11501

August 15, 1983

Raman S. Iyer  
Holzmacher, McLendon & Murrell  
125 Baylis Road  
Suite 140  
Melville, N. Y. 11747

Dear Raman:

We have completed our review of the weekly laboratory reports on John Hassall waste water discharges and have found them satisfactory. In light of this record, we recommend that the frequency of self monitoring by John Hassall be reduced from weekly to once a month. The following parameters are required to be monitored.

Aluminum  
Hexavalent Chromium  
Total Chromium  
Chloride  
Copper  
Iron  
Silver  
Sulfide  
Fluoride  
Chemical Oxygen Demand  
NH<sub>3</sub> - Nitrogen  
Total Dissolved Solids  
Oil and Grease  
pH

Please note that chloride was added to the list of parameters requested in your letter of July 29, 1983. The monthly analysis results of the self monitoring are to be sent to my attention. To be included with the report would be the weekly flowmeter readings for that month.

Very truly yours,

Matthew F. Foster

Asst. Superintendent of Sanitary Engineering

MFF:ab

cc: F. J. Flood  
M. Osman

Karl Horlitz, John Hassall ✓



PAB

JOHN HASSALL, INC. • WESTBURY • LONG ISLAND • N.Y. • 11590

Tel. 516 • 334 • 6200 • Telex No. 144585

December 22, 1983

Mr. Stanley Siegel  
E.P.A. - Solid Waste Branch  
E.P.A. - Region II  
26 Federal Plaza  
New York, N.Y. 10278

Re: E.P.A. Identification Number NYD002045417

Dear Mr. Siegel:

As agreed in our telephone conversation of Tuesday, December 20, 1983, I hereby apply for the withdrawal of John Hassall, Inc. from 40CFR265 Interim Status Hazardous Waste Storage Facility, and closure insurance bond.

Our discussion highlighted the fact that John Hassall, Inc. does not store any waste for a period longer than 90 days. Our storage facility had been issued a permit to store hazardous waste (Permit Number 10-82-0848 N.Y. State D.E.C. Part 360 [Solid Waste Management Facilities] dated May 19, 1983).

The waste consists of spent Stoddard Solvent combined with both cutting oil and lubricating oils. These oils contain paraffin, sulfur, chlorine and phosphorous and some degreasing solvents, spent freon and VG 1.1.1. These are held in lined 55 gallon drums less than 90 days, and picked up by a licensed scavenger. From our Electro Chemical Grinding operation, solutions containing Sodium Nitrite, Sodium Nitrate and Rochette Sales are stored in lined 55 gallon drums. Our sludges consist of spent Diatomite (Filter Aid) from our Shriver plate and frame filter, containing small amounts of carbon, oil or grease, and trace metals (Fe, Ni, Cr, Cu, Zn). None of these containers are held longer than 90 days.

These drums are accumulated possibly 3 drums per week of sludge. These drums, plus the oil and solvents number close to 12-15 drums prior to pick up.

JAN 25 3 04 PM '84  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

Mr. Stanley Siegel  
E.P.A. - Solid Waste Branch

- 2 -

December 22, 1983

Based on the foregoing information, the limited time of storage of our sludges and liquid wastes, we petition to withdraw from 40CFR265 Interim Status, Hazardous Waste Storage Facility and maintain the designation of Generator. I also refer to 40CFR264.1 G.5. wherein we excluded under the Total Enclosure Rule Waste Water Treatment exclusion (that we evacuate the waste in less than 90 days).

Enclosed please find certain support information regarding our facility, such as: Laboratory Reports from Holzmacher, McLendon and Murrell P.C., and the methods used to test our waste water. A short review of how John Hassall, Inc. treats its waste has also been provided.

In conclusion, since John Hassall, Inc. does not store waste longer than 90 days, and meets the criteria for designation as a generator, we would therefore petition to withdraw from Interim Status 40CFR265.

Very truly yours,



Karl W. Horlitz P.E.  
Plant Manager

KWH/rd  
Enc.

cc: Mr. Gordon Kaplan  
E.P.A. Region II  
Grants Administrative Branch  
Room 937 A  
26 Federal Plaza  
New York, N.Y. 10278



FRANCIS T. PURCELL  
COUNTY EXECUTIVE



LUDWIG C. HASL, P.E.  
COMMISSIONER

COUNTY OF NASSAU  
DEPARTMENT OF PUBLIC WORKS  
MINEOLA, NEW YORK 11501

August 15, 1983

Raman S. Iyer  
Holzmacher, McLendon & Murrell  
125 Baylis Road  
Suite 140  
Melville, N. Y. 11747

Dear Raman:

We have completed our review of the weekly laboratory reports on John Hassall waste water discharges and have found them satisfactory. In light of this record, we recommend that the frequency of self monitoring by John Hassall be reduced from weekly to once a month. The following parameters are required to be monitored.

Aluminum  
Hexavalent Chromium  
Total Chromium  
Chloride  
Copper  
Iron  
Silver  
Sulfide  
Fluoride  
Chemical Oxygen Demand  
NH<sub>3</sub> - Nitrogen  
Total Dissolved Solids  
Oil and Grease  
pH

Please note that chloride was added to the list of parameters requested in your letter of July 29, 1983. The monthly analysis results of the self monitoring are to be sent to my attention. To be included with the report would be the weekly flowmeter readings for that month.

Very truly yours,

Matthew F. Foster

Asst. Superintendent of Sanitary Engineering

MFF:ab

cc: F. J. Flood

M. Osman

Karl Horlitz, John Hassall ✓

JAN 25 3 04 PM '84  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10003

October 24, 1983

John Hassall, Inc.  
Cantiague Road  
Westbury, New York 11590

Attn: Vic Polisi

Re: Analytical Methodology

Gentlemen:

As per your request we are providing you with a list of the methods used by our laboratory to analyze your waste water discharge. The methods are described in two sources:

- 1) Standard Methods for the Examination of Water and Waste Water, 14th ed.
- 2) Methods for Chemical Analysis of Water and Wastes, EPA, 1979

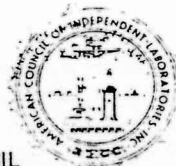
Presently we are analyzing the following parameter in your waste water (the method number and appropriate reference are shown to the left of the parameter):

<u>Reference</u>	<u>Method</u>	<u>Parameter</u>
(2)	202.1	Aluminum
(1)	307B	Hexavalent Chromium
(2)	218.1	Total Chromium
(1)	602	Chloride
(2)	220.1	Copper
(2)	236.1	Iron
(2)	272.1	Silver
(1)	428	Sulfide
(1)	414B	Fluoride
(1)	508	Chemical Oxygen Demand
(1)	418 A&D	Ammonia Nitrogen
(1)	208B	Total Dissolved Solids
(1)	502A	Oil and Grease
(1)	424	pH

575 BROAD HOLLOW ROAD, MELVILLE, N.Y. 11747 • 516-694-3040

Established in 1956

Member ACIL



October 24, 1983

If you need any additional information, please contact  
me at this office.

Very truly yours,

H2M Laboratory



Richard B. Lambert  
Chemist

RBL/slb

John Hassall has been treating the industrial effluent generated by the various processes and cleaning procedures that are utilized in our special cleaning and finishing department since 1974.

The sluges resulting from the cleaning effluents from manufacturing these special fasteners are the by-products of degreasing and cleaning these parts after they have been headed or upset on the machinery. In order to facilitate the feeding of these parts through secondary operations, these parts have to be clean, brite and dry, so as to negotiate the tracks and feeding devices designed to enhance automatic handling or indexing through the equipment.

A small percentage of our products are nickel plated in our electroplating equipment. This equipment consists of two 175 gallon plating tanks. Considering an average of 242,500 lbs of product manufactured per month, only 700 lbs of these were plated in our equipment. All other plating requirements are handled through outside vendors. Our plating is utilized for emergency measures only, where delivery time is the dominant factor.

### Waste Treatment

Our waste treatment process consist of three (3) segregated waste water streams. (Industrial washing machines, oil stripping and mixed metals waste waters), in three (3) below grade pre-cast concrete-fiberglass lined oil separation tanks, each @ 9000 gallons, then pre-settling in three (3) below grade pre-cast concrete fiber glass lined settling tanks each @ 9000 gallons, and fitted with air and CO2 defusers for mixing and PH adjustment.

Waste waters after pre-treatment by oil separation and pre-settling are pumped from three (3) separated concrete wet wells, each fitted with a 100 GPM vertical centrifical pump which delivers each of the waste waters to one of the three interior steel treatment tanks, each with a cpapcity of 10,000 gallons. Each treatment tank contains a vertical paddle wheel flocculator, air and CO2 diffusers and oil skimming over flow weirs, and variable take off effluent drains.

The first treatment consists of the addition to the effluent as follows: Calcium Hydroxide ( $\text{Ca}(\text{OH})_2$ ), Sodium Sulfide ( $\text{Na}_2\text{S}$ ), Calcium Chloride ( $\text{CaCl}_2$ ), Carbon Dioxide ( $\text{Co}_2$ ) and cationic and non ionic poly electrolyte. The effluent is flocculated and allowed to settle overnight.

The following day, this pre-treated effluent is transferred by pump into tank #2 for the second treatment.

The second treatment consists of the addition to the pre-treated effluent as follows:

Activated carbon, Aluminum Sulfate ( $\text{Al}_2 (\text{So}_4)_3$ ) and an ionic poly electrolyte. This is Flocculated for thorough mixing and allowed to settle overnight. The following day this treated effluent is pumped through the plate and frame shriver filter (this filter was previously prepared and charged with Diatomicious earth, super cell and sorbo-cell)



This will filter out the remaining suspended solids, oil and grease. The effluent is then treated with (H<sub>2</sub>O<sub>2</sub>) Hydrogen peroxide for sulfide destruction and pumped into the below grade holding tank, equipped with Aeration devices to prevent an anaerobic state from occurring.

The effluent is now tested thru the atomic absorption system, and if sewer discharge limitations are met for all parameters, this effluent is pumped into the sewer system. All discharges are recorded on a tamper proof flow meter, monitored and tested by the Nassau County Department of Public Works Cedar Creek Laboratory and evaluated against an Independent Laboratory Analysis by H2M.

## WASTE ANALYSIS PLAN

The constituents of all hazardous waste generated by John Hassall, Inc.; be it waste water or sludge resulting from treatment to this water, or oily waste, which is contained in drums (for off site disposal) remains the same although quantities of these known substances will differ.

Samples are taken on a "grab" basis and are considered most representatives of the materials in question. Thorough and continuous mixing is achieved by the use of large paddle wheel flocculators within these treatment tanks. Samples are taken off side ports. This sample is then placed into properly labeled sample jars, which have been previously prepared by an Independent Laboratory (H2M) for forwarding to them for analysis. A test method sheet has been enclosed.

All raw waste water and sludges are currently and routinely being sent for E.P. Toxicity analysis on a semi-annual basis.

Oily waste is currently being analyzed on an annual basis.

JAN 25 3 04 PM '84  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

## OUR HAZARDOUS WASTES

- 1- Spent Stoddard Solvent combined with both cutting and lubricating oils  
(these oils may contain sulfur, paraffin base oils, combined chlorine and phosphorous.)
- 2- Degreasing Solvents
  1. chlorinated safety solvents
  2. spent freon
  3. VG 1.1.1
- 3- Salt Solutions  
From electro chemical grinding. May contain Sodium Nitrite, Sodium Nitrate, and Rochelle Salts.
- 4- Spent Diatomite - (filter aid) containing small amounts of carbon, oil or grease and trace metals. (Fe, Ni, Cr, Cu, Zn



Environmental Engineers &amp; Scientists

 HOLZMACHER, McLENDON and MURRELL, P.C.  
 575 BROAD HOLLOW ROAD, MELVILLE, NEW YORK 11747 (516) 694-3040

# LABORATORY REPORT

 WATER RESOURCES • WATER SUPPLY & TREATMENT • SEWERAGE & TREATMENT • ECOLOGICAL & IMPACT STUDIES  
 MODEL STUDIES • PILOT PLANT STUDIES • WATER/WASTE WATER LABORATORY AND ANALYTICAL SERVICES

 LAB NO. 35708  
 PROJECT NO. 20

## CLIENT'S NAME AND ADDRESS

JOHN HASSALL, INC.

CANTIAGUE RD

WESTBURY NY 11590

TYPE OF SAMPLE - INDUSTRIAL WASTE

DATE COLLECTED - 10/12/83

COLLECTED BY CL 9

DATE RECEIVED - 10/13/83

TREATED WASTE

PARAM-ETER	RESULT	PARAM-ETER	RESULT
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ALUMI-NUM	<0.20	COD	648.
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CHROM-IUM	0.45	AMMONIA (NH3-N)	7.60
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HEX. CHROM.	<0.02	T. DISS SOLIDS	3.30%
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CHLOR-IDE	20.0	OIL & GREASE	<5.00
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COPPER	0.06	PH	8.50
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IRON	1.07		
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SILVER	0.08		
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SULFIDE	<0.05		
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FLUOR-IDE	0.14		
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REMARKS - COPY TO JJM

ALL RESULTS IN (MG/L.) EXCEPT AS NOTED BY # (UG/L.) OR % (PERCENT) AND

T. COLI BACT. &amp; FECAL COLI (MPN/100ML)

COLOR, ODOR, TURBIDITY &amp; PH (UNITS)

APC &amp; FECAL STREP (COUNTS/ML)

SPEC. COND. (UMHOS) SETT. SOLIDS (ML/L)

DATE REPORTED 11/18/83

  
 S. C. McLendon, P.E., LABORATORY DIRECTOR





Environmental Engineers &amp; Scientists

HOLZMACHER, McLENDON and MURRELL, P.C.

575 BROAD HOLLOW ROAD, MELVILLE, NEW YORK 11747 (516) 694-3040

WATER RESOURCES • WATER SUPPLY & TREATMENT • SEWERAGE & TREATMENT • ECOLOGICAL & IMPACT STUDIES  
MODEL STUDIES • PILOT PLANT STUDIES • WATER/WASTE WATER LABORATORY AND ANALYTICAL SERVICESLABORATORY  
REPORT

LAB NO. 358213

PROJECT NO. 20

CLIENT'S NAME AND ADDRESS

JOHN HASSALL, INC.

CANTAGUE RD

WESTBURY NY 11590

TYPE OF SAMPLE - INDUSTRIAL WASTE

COLLECTED BY CL 99

DATE COLLECTED - 11/ 4/83

DATE RECEIVED - 11/ 9/83

TREATED WASTE

PARAM- ETER	RESULT	PARAM- ETER	RESULT
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ALUMI- NUM	0.30	COD	534.
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CHROM- IUM	0.25	AMMONIA (NH <sub>3</sub> -N)	7.50
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HEX. CHROM.	<0.02	T. DISS SOLIDS	1.08%
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CHLOR- IDE	130.	OIL & GREASE	<5.00
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COPPER	0.19	PH	8.30
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IRON	8.14		
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SILVER	<0.02		
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SULFIDE	<0.05		
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FLUOR- IDE	<0.10		
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ALL RESULTS IN (MG/L) EXCEPT AS NOTED BY ‡ (UG/L) OR % (PERCENT) AND

T.COLI BACT. &amp; FECAL COLI (MPN/100ML)

COLOR, ODOR, TURBIDITY &amp; PH (UNITS)

APC &amp; FECAL STREP (COUNTS/ML)

SPEC.COND. (UMHOS) SETT.SOLIDS (ML/L)

DATE REPORTED 12/14/83

  
S.C. McLENDON, P.E., LABORATORY DIRECTOR